

1 Thomas J. Nolan (SBN 48413)
2 NOLAN, ARMSTRONG & BARTON LLP
3 600 University Avenue
4 Palo Alto, California 94310
5 650/326-2980 – Telephone
6 650/326-9704 – Facsimile
7 tnolan@nablaw.com

8 Attorney for Defendant
9 OMAR CARBALLO-DELGADO

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

11 UNITED STATES OF AMERICA,) No. CR 08-00512 JF
12)
13 Plaintiff,)
14)
15 vs.) STIPULATION AND PROPOSED
16) ORDER CONTINUING STATUS
17 OMAR CARBALLO-DELGADO,) CONFERENCE
18)
19 Defendant.)
20)
21)
22)

23 **STIPULATION**

24 Defendant Omar Carballo-Delgado, by and through his attorney Thomas J. Nolan, and
25 the United States, by and through Assistant United States Attorney Chad Mandell, hereby agree
and stipulate to continue the status hearing now scheduled for April 1, 2009, at 9:00 a.m., to
April 15, 2009, at 9:00 a.m.

The parties so stipulate because they are engaged in ongoing settlement discussions with
the assistance of Magistrate Judge Richard Seeborg. The parties anticipate that, at the April 15,
2009, status conference, the defendant will either enter a plea or set a trial date. Because the
settlement negotiations with the assistance of the Court likely would not be completed by April

1 1, the parties agree that a two-week continuance would promote efficiency and serve the ends of
2 justice.

3 The parties further stipulate and request that time up to and including April 15, 2009, be
4 excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161.

5 IT IS SO STIPULATED

6
7 Date: March 26, 2009

8 /S/
Thomas J. Nolan
Attorney for Defendant
9 Omar Carballo-Delgado

10
11 Date: March 26, 2009

12 /S/
Chad Mandell
Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that the status conference currently set for April 1, 2009, at 9:00 a.m., is continued to April 15, 2009, at 9:00 a.m. Time is excluded through April 15, 2009, pursuant to 18 U.S.C. § 3161(h)(8). The Court finds that the ends of justice served by this continuance outweigh the interests of the public and the defendants in a speedy trial.

Date: 3/31/09



Hon. Jeremy Fogel
United States District Judge